

## The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MAJID ALFARAG,

Case No. 2:22-cv-01745-MJP

**Plaintiff.**

**STIPULATED MOTION AND  
[PROPOSED] ORDER FOR EXTENSION  
OF TIME TO RESPOND TO MOTION FOR  
JUDGMENT ON THE PLEADINGS AND  
CORRESPONDING MODIFICATION OF  
CASE SCHEDULE**

V.

12 LOUIS DEJOY, Postmaster General, U.S.  
Postal Service.

**Defendant.**

Noted for Consideration:  
May 8, 2024

As a result of Plaintiff's request for more time to search for legal representation, the parties

17 hereby STIPULATE, AGREE and JOINTLY REQUEST an order extending the response and  
18 corresponding reply deadlines for Defendant's Motion for Judgment on the Pleadings by 60 days  
19 modifying the deadlines set forth in the Court's July 21, 2023, Order Setting Trial and Related  
20 Dates (Dkt. 22), as follows:

STIPULATED MOTION AND [PROPOSED] ORDER FOR  
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[Case No. 2:22-cv-01745-MJP] - 1

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Plaintiff's Response to Defendant's Motion for Judgment on the Pleading due by	5/13/2024	7/15/2024
Defendant's Reply in Support of Motion for Judgment on the Pleadings due by	5/17/2024	7/19/2024
Discovery completed by	5/20/2024	7/19/2024
All dispositive motions must be filed by	6/17/2024	8/16/2024

In addition, the parties ask the Court to set a new trial date of no earlier than December 16, 2024, with all trial related deadlines set corresponding to the new trial date. The parties have set forth their current scheduling conflicts below:

Plaintiff:

Defendant: December 26, 2024–January 3, 2025; January 14–20, 2025; February 24–March 11, 2025; April 14–18, 2025; May 12–15, 2025.

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). Good cause exists for extending the specific deadlines noted above, as Plaintiff is requesting additional time to respond to Defendant's Motion in order to seek counsel. Defendant joins in the request in order to provide Plaintiff sufficient time.

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[Case No. 2:22-cv-01745-MJP] - 2

UNITED STATES ATTORNEY  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
206-553-7970

1           **SO STIPULATED.**

2           DATED this 8th day of May, 2024.

3           Respectfully submitted,

4           TESSA M. GORMAN  
5           United States Attorney

6           s/ Rebecca S. Cohen  
7           REBECCA S. COHEN, WSBA No. 31767

8           s/ Alixandria K. Morris  
9           ALIXANDRIA K. MORRIS, TX No. 24095373  
10          Assistant United States Attorneys  
11          United States Attorney's Office  
12          Western District of Washington  
13          700 Stewart Street, Suite 5220  
14          Seattle, Washington 98101-1271  
15          Phone: 206-553-7970  
16          Fax: 206-553-4073  
17          Email: [rebecca.cohen@usdoj.gov](mailto:rebecca.cohen@usdoj.gov)  
18          Email: [alixandria.morris@usdoj.gov](mailto:alixandria.morris@usdoj.gov)

19          *Attorneys for Defendant DeJoy*

20          I certify that this memorandum contains 258  
21          words, in compliance with the Local Civil Rules.

22           s/ Majid Alfarag  
23          Majid Alfarag  
24          10032 Edmonds Way, Apt 210  
25          Edmonds, WA 98020  
26          Phone: 509-879-4237  
27          Email: [majid.alfarag@yahoo.com](mailto:majid.alfarag@yahoo.com)

28          *Pro Se Plaintiff*

## ORDER

It is hereby ORDERED that the parties' motion is GRANTED.

DATED this 8th day of May, 2024.

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MARSHA J. PECHMAN  
United States Senior District Judge